

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Danny ROBINSON

Case: 2:22-mj-30067

Assigned To : Unassigned

Case No.

Assign. Date : 2/11/2022

Description: CMP USA v. SEALED
MATTER (SO)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

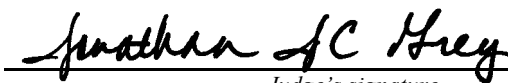
On or about the date(s) of May 4, 2021 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. 922(g)(1)

Felon in possession of a firearm

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.*Complainant's signature*Special Agent Barry Gatza - ATF*Printed name and title*Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: February 11, 2021City and state: Detroit, Michigan*Judge's signature*Honorable Jonathan J.C. Grey, U.S. Magistrate Judge*Printed name and title*

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Special Agent Barry Gatza, being duly sworn, do hereby state the following:

I. INTRODUCTION

1. I am a Special Agent “SA” with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”), and have been since January 2020.

2. I have received extensive training at, and successfully graduated from, the Federal Law Enforcement Training Center in the Criminal Investigator Training Program and ATF Special Agent Basic Training. Prior to becoming an ATF Special Agent, I was a Sheriff’s Deputy with Bay County, Michigan, for over ten years. During that time, I spent three years on the Bay Area Narcotics Enforcement Team (BAYANET) enforcing state narcotics and firearms violations.

3. I have personally investigated, and assisted in the investigation of, numerous cases which involved search warrants, arrests, prosecutions, and the seizure of large quantities of narcotics and firearms.

4. During my time in law enforcement, I have participated in many investigations into firearms crimes, armed drug trafficking violations, and offenses by criminal street gangs, among others. While with the ATF, I have authored multiple federal criminal complaints and federal search warrants of premises, cellular phones, and social media data. In addition, I have utilized a variety of investigative techniques and resources, including physical and electronic surveillance, undercover and various types of informants, and cooperating sources.

5. Through these investigations, my training and experience, and conversations with other agents and other law enforcement personnel, I have become familiar with firearms violations, and also with methods used by gang members and drug traffickers to smuggle and safeguard controlled substances, to distribute controlled substances, and to collect, launder, hide, disguise or conceal related proceeds.

6. This affidavit includes information provided to me by and/or through other law enforcement agents, investigators, and individuals with knowledge of this matter, my investigation, and the review of documents.

7. This affidavit establishes probable cause that Danny ROBINSON (“ROBINSON”), date of birth xx/xx/1991 violated 18 U.S.C. § 922(g)(1), as a felon in possession of a firearm. This affidavit does not include all the information known to law enforcement related to this investigation.

II. PROBABLE CAUSE

8. In April 2021, ATF SA Henry, received information from an ATF Confidential Informant (“CI”) regarding a male who possesses and sells firearms frequently. SA Henry and the CI identified the male as ROBINSON, a multi-convicted felon.

9. ATF Intelligence Research Specialist (“IRS”) Justin Borst ran a Computerized Criminal History (“CCH”) for ROBINSON. According to his CCH, ROBINSON had multiple felony convictions consisting of:

- a. 12/10/2009 - Assault with Intent to Rob while Armed and Felony Firearm;
- b. 07/30/2014 - Carrying a Concealed Weapon.

10. SA Henry queried ROBINSON with Michigan Department of Corrections Parole Agent Krzyak and found that ROBINSON was on parole and was on GPS tether.

11. In May 2021, ROBINSON informed the CI he traffics firearms and had a Tristar 12-gauge shotgun available for purchase. ROBINSON further advised that he purchases firearms from out of state and sells the firearms in Michigan. ROBINSON provided the CI with the below picture.



12. On May 4, 2021, ROBINSON agreed to sell the firearm that afternoon at a location located within the city of Detroit, Eastern District of Michigan, at approximately 5:00 PM. ROBINSON further advised he expected \$1,100 in exchange for the firearm.

13. Later on May 4, 2021, at approximately 5:31 p.m., SA Henry and the CI arrived in a strip mall parking lot, located at 16222 W. Warren, Detroit, Michigan 48228, and parked an undercover vehicle

(UCV) inside of the lot. Shortly after parking, SA Henry observed a gold Pontiac G6 vehicle arrive and park in front of the UCV. SA Henry observed an unknown black female driving the vehicle, with ROBINSON as the front-seat passenger. ROBINSON exited the Pontiac G6 holding a silver and black pistol (with extended magazine) in his left hand. ROBINSON proceeded to walk to the trunk of the Pontiac G6 while simultaneously waiving for SA Henry and CI to also walk towards the trunk of the Pontiac G6.

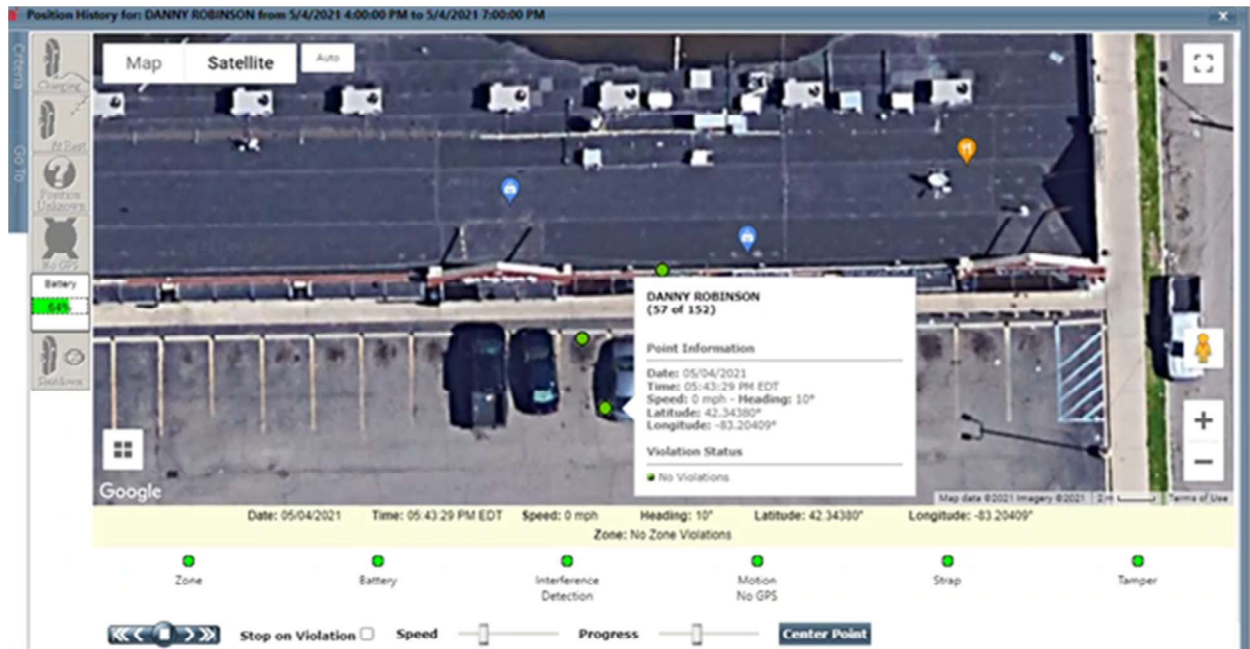
14. ROBINSON continued to hold the silver and black pistol in his left hand while periodically placing the pistol in the left pocket of his jogging pants. ROBINSON opened the trunk of the Pontiac G6 and the CI proceeded to retrieve one Tristar gun box containing one (1) Tristar Model: KRX, Serial Number: KRX013348, 12-guage shotgun; two (2) Tristar KRX magazines; and three (3) rounds of assorted ammunition. SA Henry proceeded to hand ROBINSON \$1,100 of prerecorded government funds in exchange for those items.

15. SA Henry inquired about purchasing the pistol ROBINSON was holding and ROBINSON declined. ROBINSON further advised his

girlfriend recently caught a gun charge with one of ROBINSON's firearms; therefore, that was the only pistol in his possession. ROBINSON advised he is currently on tether and once he gets released from tether, he plans to go to Kentucky to get more firearms.

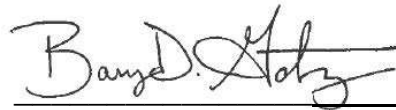
16. On May 5, 2021, ATF SA McLean examined the Tristar (Kral), Model KRX, 12 gauge, semi-automatic shotgun, S/N: KRX013348 and determined the shotgun is a firearm as defined under 18 U.S.C. § 922, and that it was manufactured outside the state of Michigan and therefore had traveled through interstate and/or foreign commerce.

17. On May 10, 2021, SA Gatz received ROBINSON's GPS tether information from MDOC Parole Agent Kryzak pertaining to ROBINSON's location during the controlled purchase that was conducted on May 04, 2021. On the date and time of the controlled purchase of the shotgun, ROBINSON's tether tracked him to the location of the purchase. *See below photograph.*



III. CONCLUSION

18. Probable cause exists that Danny ROBINSON, a previously-convicted felon, was in possession of the above described firearm, said firearm having traveled in interstate commerce, in violation of Title 18 U.S.C. § 922(g)(1).



Barry Gatz, Special Agent
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn to before me and signed in my presence
and/or by reliable electronic means.



HONORABLE JONATHAN J.C. GREY
UNITED STATES MAGISTRATE JUDGE

Date: February 11, 2022